SOUTHERN DISTRICT OF NEW YORK	x	
EDWARD PITRE,		
I	Plaintiff,	NOTICE OF MOTION FOR
-against-		SANCTIONS, ATTORNEYS'
		FEES AND COSTS
THE CITY OF NEW YORK,		
FIRE DEPARTMENT OF THE CITY		18 CV 5950 (DC)
OF NEW YORK, JAN BORODO, individu	ally,	
JOHN FIORENTINO individually, and		
JOSEPH M. MASTROPIETRO, individuall	y	
	D C 1	
	Defendants.	
	X	

PLEASE TAKE NOTICE that, upon the Declaration of Desiree Alexander dated March 1, 2024, the accompanying Memorandum of Law, and annexed exhibits, and all the papers and proceedings herein, Defendants City of New York, Jan Barodo, and Joseph Mastropietro (collectively, "Defendants") will move this Court, before the Honorable Denny Chin, United States Second Circuit Judge, visiting the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, 10007, on a date and time to be designated by the Court, for an order and judgment, pursuant to 28 USCS § 1927 and under the Court's inherent powers seeking sanctions, attorneys' fees and costs against Plaintiff himself, trial counsel and firm.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Scheduling Order dated February 14, 2024, Plaintiff's papers in opposition to the motion are to be filed on or

¹ The claims against Defendant Fire Department of the City of New York was dismissed, on consent, with prejudice from this action at the October 11, 2023 pre-trial hearing.

before march 15, 2024, and Defendants' reply papers, if any, are to be filed on or before March 22, 2024.

Dated: New York, New York

March 1, 2024

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the City of New York Attorney for Defendants 100 Church Street, 2nd Floor New York, New York 10007 (212) 356-2203 dealexan@law.nyc.gov

By: /s/
Desiree Alexander
Assistant Corporation Counsel

TO: Seamus Barrett; Zachary Holzberg; and Derek Smith (VIA ECF)

Attorney for Plaintiff

Derek Smith Law Group, PLLC

1 Pennsylvania Plaza, Suite 4905

New York, NY 10119

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18 CV 5950 (DC)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EDWARD PITRE,

Plaintiff,

-against-

THE CITY OF NEW YORK, FIRE DEPARTMENT OF THE CITY OF NEW YORK, JAN BORODO, individually, JOHN FIORENTINO individually, and JOSEPH M. MASTROPIETRO, individually

Defendants.

NOTICE OF DEFENDANTS' MOTION TO FOR SANCTIONS, ATTORNEYS' FEES AND COSTS

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the City of New York Attorney for Defendants 100 Church Street, 2nd Floor New York, New York 10007

 ${\it Of Counsel: Desiree Alexander}$

Tel: (212) 356-3177 Matter #: 2018-064552

Due and timely service is hereby admitted.	
New York, N.Y.	, 2023
	, Esq.
Attorney for	